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AT&T Bell Laboratories
101 Crawfords Corner Road
Holmdel, New Jersey 07733

November 29, 1995

Mr. Yog Varma
New York Public Service Commission
Three Empire State Plaza
Albany, New York 12223

Dear Mr. Varma:

This letter responds to your request at the November 17 meeting of the New York Local Number Portability Trial Steering Committee that each participating company state its views with respect to

1. Conducting the trial and moving towards implementation of permanent number portability in New York
2. Scope of the trial including use of 6- versus 10-digit triggers.
3. Feasibility of the proposed 2/1/96 trial start date.

As stated at the Steering Committee meeting, AT&T believes that it is important to move forward with both the New York trial as currently planned and, on a parallel track, the work necessary to implement local number portability in New York state. Although the trial will not test the Location Routing Number (LRN) solution that AT&T supports and which appears to be emerging as the industry consensus, we believe the trial offers important learning opportunities for the industry. These include experience with capabilities such as 10-digit Global Title Translations in a Service Control Point and procedures such as those for seamless porting of customers that will be required by any permanent LNP solution. These opportunities do not exist in other jurisdictions yet will contribute to the successful implementation of number portability nationally just as the work already done in defining the New York trial played a major role in driving the evolution of the industry's approach to number portability.

AT&T also believes that choice of a call model, development of an industry Service Management System, and other work required for full scale implementation of permanent portability should not be put off until the trial's completion but can and should begin now. The Commission should authorize the industry to choose a call model and then order the implementation of portability. AT&T will offer a more detailed proposal as to how this goal may best be achieved so as to insure that implementation of LNP in New York does not lag behind other states.



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November 29, 1995

Mr. Yog Varma
New York State Public Service Commission
Three Empire State Plaza
Albany, New York 12223

Dear Mr. Varma,

Per your request, this letter constitutes U.S. Intelco's position statement with respect to the Rochester, NY Local Number Portability Trial.

As we stated at the most recent Steering Committee meeting, it is U.S. Intelco's goal to further the implementation of number portability in the state of New York and to support the trial participants in Rochester. It is our position that the parallel path approach to implementation be pursued, with the following considerations:

1. Given the certainty of the selection of LRN as the preferred wireline implementation in New York, and the fact that LRN will not be trialed in either venue, trial parameters, purpose, goals and duration need to be completely and clearly redefined.
2. Given the complexity and the additional time and cost involved to participants and administrators by including live customers in the trial, we suggest the trial should only proceed through Phase I.
3. Given the very limited number of active participants in Rochester (RochesterTel, Time Warner as full participants and Cellular One on a limited/passive basis), we suggest it may make sense to forego the Rochester portion of the trial and concentrate all efforts in Manhattan. Time Warner is already participating in Manhattan; RochesterTel may also be able to participate there through the use of a foreign exchange NXX. Participation will, unfortunately, be of limited value to Cellular One, because of its switching limitations during the trial period.
4. We suggest that the Rochester trial (if held) be slipped from its original start date of 2/1/96 to 4/1/96 for the following reasons:
 - Delay in commission order to proceed with trial
 - Delay in participant commitment to trial
 - Delay in switch vendors commitment of new LNP generics
 - Selection of LRN as call model
 - Uncertainty of participants as to purpose, scope, duration and number of phases that should be included in the trial.
 - Final decision on if and what to trial will not be made until 12/8/95

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**SYSTEM PLANNING SECTION
COMMUNICATIONS DIVISION**

Lawrence J. Chu
Director
Regulatory Planning

December 4, 1995

Mr. Yog Varma
Chief System Planner, Communications Division
State of New York Department of Public Service
Three Empire State Plaza
Albany, NY 12223-1350

Dear Mr. Varma,

At the November 17th meeting of the New York Local Number Portability (LNP) Trial Steering Committee, you asked each participating company to respond to a set of questions regarding the direction/scope of the trial. The questions and our responses are shown below:

1. Q. What is your ability to meet the 2-1-96 trial start date?
 - A. NYT is ready to begin the trial on 2-1-96 as previously scheduled.
2. Q. Should the trial proceed with 10 digit triggers or 6 digit triggers?
 - A. The use of six digit triggers has the potential to adversely affect the service of every customer in the ported NXX. Although one vendor has proposed a solution designed to limit the impact of anticipated service affecting problems, this solution involves trial specific non-commercial grade software which, in our opinion, is not suitable for use outside a "lab" environment. New York Telephone has serious reservations about deploying such software in its trial switches due to possible service impacts on large numbers of customers not participating in the trial. In our opinion, the use of ten digit triggers is the only available workaround which is acceptable for the trial allowing us to limit the scope of service affecting problems.

5. Q. Should a committee be formed to develop a Request for Proposal for a Service Management System to support LNP deployment?

A. The question on the formation of a committee to develop a Request for Proposal for a Service Management System (SMS), the composition of such a committee, and its authority is premature. If the New York LNP Steering Committee does decide to modify the current trial to include a more suitable addressing scheme, such as LRN, it may be appropriate to address such questions regarding an SMS at that time.

New York Telephone continues to support the trial effort and remains committed to deploying a suitable long term number portability solution which the Commission has determined to be in the public interest. The evaluation of such solutions should be based on a comprehensive analysis of deployment cost, cost recovery, and other technical and operational issues which can best be identified and addressed in the context of a trial. While discussion of implementation planning may be appropriate, actual deployment cannot proceed before such issues are addressed. If you have any questions or comments on this information, please call me on 212-395-1209 or your staff can contact Bill Higgins on 212-395-0904

Sincerely,



Copy to:

LNP Trial Steering Committee Members

together to anticipate the final methods required is likely to make the eventual implementation of a long term solution go smoother. Since TCG has worked with NYNEX for many years to establish methods for interconnection, a lesser advantage accrues to TCG than some other participants. TCG recognizes that other trial participants may recognize sufficient benefits to desire the trial to continue as originally constituted.

At this time TCG would suggest that a redirection of the trial parties to also focus on selection and implementation of the long term Number Portability solution for NY State is now more beneficial to NY consumers. TCG wishes to have the long term solution for Number Portability available as soon as possible in NY State. TCG does not believe that devoting resources at hand to the trials as presently constituted will enhance the availability of this long term solution and in fact has the potential to delay the availability of the long term solution. There are many other business tasks required before Number Portability can be made available to consumers. These activities have not begun in NY. The trial has detracted from getting these other tasks accomplished. These other necessary activities should be done in parallel with the currently planned trial activities.

A change in trial goals might enhance the value of the trial. For example, if a long term solution is quickly chosen and the current trial solutions are compatible, it may be possible to sustain the trial networks for a longer test period to test transitions to the long range solution.

In spite of TCG's perception of marginal value of the current trials, we remain committed to advancing Number Portability and will remain a participant in the Manhattan trial consistent with the availability of our resources.

Sincerely yours,



Director- Network Architecture and Modeling